

# Exhibit H\_ Defendant- Opposer's Supplemental Pretrial Disclosures

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

DONALD J. TRUMP,

Opposer,

Opposition No. 91217618

-against-

TRUMP YOUR COMPETITION, INC.,

Applicant.

**OPPOSER'S SUPPLEMENTAL PRETRIAL DISCLOSURES**

Pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure and Section 2.121 of the Trademark Rules of Procedure, 37 C.F.R. § 2.121, Opposer Donald J. Trump (“Opposer”), through his undersigned counsel, hereby supplements Opposer’s Pretrial Disclosures as follows:

A. Witness List.

Opposer intends to or may take the testimony of the following witnesses:

Alan Garten  
Executive Vice President and General Counsel  
The Trump Organization  
725 Fifth Avenue  
New York, New York 10022

Eric Trump  
Executive Vice President of Development and Acquisitions  
The Trump Organization  
725 Fifth Avenue  
New York, New York 10022

B. Subject Matters and Documents Introduced During Testimony.

The foregoing witnesses may testify regarding the history and business of the TRUMP MARKS (as defined in Opposer’s Responses to Applicant’s First Set of Interrogatories, dated

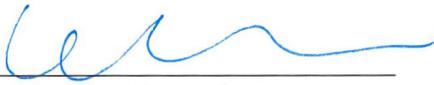
February 19, 2015) and Opposer's efforts to police the TRUMP MARKS.

The types of documents and things which may be introduced as exhibits during the testimony of the foregoing witnesses include the following:

- Documents concerning Opposer's history and business.
- Documents concerning the TRUMP MARKS.
- The contents of the United States Patent and Trademark Office file histories, applications and certificates of registration for the TRUMP MARKS.

Dated: New York, New York  
November 4, 2015

HUGHES HUBBARD & REED LLP

By: 

Natasha N. Reed

Lena C. Saltos

725 Fifth Avenue  
New York, New York 10022  
(212) 715-6783  
*Attorney for Opposer*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing OPPOSER'S SUPPLEMENTAL PRETRIAL DISCLOSURES is being served on November 4<sup>th</sup>, 2015 by first class mail and email upon counsel for Applicant as follows:

Rod Underhill, Esq.  
P.O. Box 1238  
Julian, CA 92036-1238  
Email: [mp3rod@aol.com](mailto:mp3rod@aol.com)

Dated: New York, New York  
November 4, 2015



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Lena C. Saltos